# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

B.P., et al.,	
Plaintiffs,	
v.	No: 2:23-cv-00071-TRM-JEM
CITY OF JOHNSON CITY, TEN	NNESSEE, et al.,
Defendants.	

## **JOINT STATUS REPORT**

COME NOW Plaintiffs B.P., H.A., and S.H., individually and as proposed class representatives of all others similarly situated, ("Plaintiffs"), and Defendants City of Johnson City, Tennessee, Karl Turner, Toma Sparks, and Jeff Legault (collectively, the "Parties"), through their respective undersigned counsel, who provide the following report pursuant to the Court's corresponding October 11, 2024 Order [ECF 381].

The Parties have reached agreement that the deposition of Sean Williams will be split equally per side (Plaintiffs 50% and Defendants 50%). The Parties are corresponding with the relevant law enforcement officials to coordinate the logistics of the deposition.

Respectfully Submitted on October 18, 2024.

### /s//Elizabeth A. Kramer

Julie C. Erickson (California Bar # 293111)
Elizabeth A. Kramer (California Bar # 293129)
Kevin M. Osborne (California Bar #261367)
Pro Hac Vice
Erickson Kramer Osborne LLP
44 Tehama St.
San Francisco, CA 94105
415-635-0631
julie@eko.law
elizabeth@eko.law
kevin@eko.law

### s/ Heather Moore Collins

Heather Moore Collins (# 026099)
Ashley Shoemaker Walter (#037651)
HMC Civil Rights Law, PLLC
7000 Executive Center Dr., Suite 320
Brentwood, TN 37027
615-724-1996
615-691-7019 FAX
heather@hmccivilrights.com
ashley@hmccivilrights.com

#### /s Vanessa Baehr-Jones

Vanessa Baehr-Jones CABN # 281715 Pro Hac Vice Advocates for Survivors of Abuse PC 4200 Park Boulevard No. 413 Oakland, CA 94602 510-500-9634 vanessa@advocatesforsurvivors.com

Attorneys for Plaintiffs and the Proposed Classes

# <u>/s/ K. Erickson Herrin</u>

K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 rachel@hbm-lawfirm.com

# /s/ Emily C. Taylor

Emily C. Taylor
Maria Ashburn
WATSON, ROACH, BATSON & LAUDERBACK,
P.L.C.
P.O. Box 131
Knoxville, TN 37901-0131
etaylor@watsonroach.com
mashburn@watsonroach.com

Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, and Investigator Toma Sparks, in his official capacity

# /s /Jonathan P. Lakey

Jonathan P. Lakey Burch, Porter, & Johnson, PLLC 130 N. Court Ave. Memphis, TN 38103 jlakey@bpjlaw.com mchrisman@bpjlaw.com

Attorney to Defendant City of Johnson City, Tennessee

### /s/ Kristin Ellis Berexa

Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law

Counsel for Toma Sparks in his individual capacity

## <u>/s/ Keith H. Grant</u>

Keith H. Grant Laura Rufolo Robinson, Smith & Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 kgrant@rswlaw.com lrufolo@rswlaw.com

Counsel for Jeff Legault in his individual capacity

# MOORE, RADER & YORK, P.C.

/s/ Daniel H. Rader IV

DANIEL H. RADER III

DANIEL H. RADER IV / BPR #025998

ANDRÉ S. GREPPIN / BPR #036706

46 North Jefferson Avenue

Cookeville, Tennessee 38501

Phone: (931) 526-3311

danny@moorerader.com

Counsel for Defendant Karl Turner in his individual capacity

### **CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on October 18, 2024 to counsel of record:

K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 rachel@hbm-lawfirm.com

Emily C. Taylor
Maria Ashburn
WATSON, ROACH, BATSON &
LAUDERBACK, P.L.C.
P.O. Box 131
Knoxville, TN 37901-0131
etaylor@watsonroach.com
mashburn@watsonroach.com

Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, and Investigator Toma Sparks, in his official capacity

Jonathan P. Lakey Burch, Porter, & Johnson, PLLC 130 N. Court Ave. Memphis, TN 38103 901-524-5000 jlakey@bpjlaw.com mchrisman@bpjlaw.com

Attorney to Defendant City of Johnson City, Tennessee Kristin Ellis Berexa
Ben C. Allen
FARRAR BATES BEREXA
12 Cadillac Drive, Suite 480
Brentwood, TN 37027-5366
kberexa@fbb.law
ballen@fbb.law
jdowd@fbb.law
msutton@fbb.law

gpatton@fbb.law

Counsel for Toma Sparks in his individual Capacity

Keith H. Grant
Laura Beth Rufolo
Robinson, Smith & Wells, PLLC
633 Chestnut Street, Suite 700
Chattanooga, TN 37450
kgrant@rswlaw.com
lrufolo@rswlaw.com
awells@rswlaw.com

Counsel for Jeff Legault in his individual capacity

Daniel H. Rader IV MOORE, RADER & YORK PC 46 North Jefferson Avenue P. O. Box 3347 Cookeville, TN 38501 danny@moorerader.com

Counsel for Defendant Karl Turner in his individual Capacity

/s/ Elizabeth A. Kramer Elizabeth A. Kramer